M E M O R A N D U M

DATE: January 7, 2008

TO: Rose Longoria, Yakama Nation

FROM: Bob Dexter, Ph.D. and Sheila Fleming, RIDOLFI Inc.

SUBJECT: **Comments on the Ecological Risk Assessment Approach**

Listed below are our comments on the Ecological Risk Assessment Approach:

1. All of the documents can use thorough editing. For example, Table 6 of the sediment screening memo should be titled "Subsurface Sediments…."

Sediment Screen:

2. In the sediment screen, while the differences in the maximum concentration data retrieved from the data base and reported from the Round 2 report weren't large, it would be helpful to know how and why the discrepancies occurred.
3. The sediment screening was preformed according to the approach agreed to on the previous conference calls.

Tables of Risk Approaches by Line of Evidence:

4. Neither adult lamprey nor ammocoetes were included in the fish dietary exposure route. There may be limited supporting data, but some reasonable assumptions can be made.
5. Adult lamprey were not included in the Surface Water exposure route.
6. It seems reasonable to assume 100% exposure of ammocoetes to Transition Water. Some discussion of using the results of the water-only bioassays should be included regarding the TRVs.
7. Adult lamprey were not included in the Tissue Residue line of evidence.
8. Ammocoetes were not included in the Sediment exposure line of evidence
9. Presupposing future uses of the information, is it reasonable to suggest organizing the risk conclusions by location by chemical by resource, as well as the more direct by resource by chemical that largely applies to the current approach?

Weight of Evidence Approach:

10. I have no specific comments on the approach, other than to note that it would help me to determine the utility and appropriateness if the concept was completed by stating "Weight of Evidence *that.*…" For example, the "Weight of Evidence that Chemical A is posing and unacceptable risk to resources at Location X," or the "Weight of Evidence that the concentrations of chemicals at Location X A are posing and unacceptable risk to resources."